

**Harold Salant Strassfield & Rotbard**  
**Attorneys for Defendant Laura Christy Midtown LLC**  
**81 Main Street**  
**White Plains, NY 10601**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PAVLE ZIVKOVIC, on behalf of himself and others  
similarly situated,

Plaintiffs,

- against -

LAURA CHRISTY LLC d/b/a VALBELLA, LAURA  
CHRISTY MIDTOWN LLC, DAVID  
GHATANFARD, and GENO LUCA,

Defendants.

**17-CV-00553 (GHW)**

**DECLARATION OF DAVID  
GHATANFARD**

Pursuant to 28 U.S.C. § 1746, and under the penalty of perjury, David Ghatanfard declares as follows:

1. I am a defendant in the above-captioned action. I submit this declaration in support of the motion by defendants Laura Christy LLC d/b/a Valbella, Laura Christy Midtown LLC, and me (collectively, "Movants") for a stay pending appeal of all enforcement proceedings, including discovery, that plaintiffs ("Class Plaintiffs") have undertaken in connection with the partial judgment entered in this case on July 4, 2023 ("Partial Judgment").

2. In early August 2023, I was diagnosed as having stage four metastatic cancer. I have begun an aggressive regimen of anti-cancer therapies. My doctors have informed me that, during treatment, I should expect to feel significantly debilitated in regard to both physical stamina and mental concentration as well as unable fully to participate in the continuing defense of this litigation. They have also advised me that ongoing emotional stress during treatment can

3. Those very serious considerations have caused me to seek a stay, pending appeal, of all enforcement proceedings commenced by Class Plaintiffs to enforce the Partial Judgment.

Dated: August 31, 2023

By:

  
DAVID GHATANFAR